

Morse, Bob

From: Morse, Bob
Sent: Monday, July 30, 2018 6:12 PM
To: Pocze, Doug
Subject: RE: Griffiss AFB Revised Draft Basewide PFAS (AFFF) SI Report

Do you want to know from the SI whether it goes offbase? That would seem to me to be RI nature and extent, which as I said I would comment on the SI that we expect eventual RI in the future
Theyre doing some of that at Plattsburgh where they have confirmed off base wells (53 of them) and exceeded the HA at 4 of them.
But griffiss did 2 surveys and eventually went out 4 mi. I saw ur comment re Minnesota 6 mi plume but

From: Pocze, Doug
Sent: Monday, July 30, 2018 5:49 PM
To: Morse, Bob <Morse.Bob@epa.gov>
Subject: RE: Griffiss AFB Revised Draft Basewide PFAS (AFFF) SI Report

Ok... presence confirmed. Somewhat high values.
Next ... Does it go off base.

From: Morse, Bob
Sent: Monday, July 30, 2018 10:57 AM
To: Pocze, Doug <Pocze.Doug@epa.gov>
Subject: RE: Griffiss AFB Revised Draft Basewide PFAS (AFFF) SI Report

I don't believe any attempt was made to determine if it reached boundary. Purpose is presence absence on base.

thanks

From: Pocze, Doug
Sent: Sunday, July 29, 2018 8:19 PM
To: Morse, Bob <Morse.Bob@epa.gov>
Subject: RE: Griffiss AFB Revised Draft Basewide PFAS (AFFF) SI Report

See below

From: Morse, Bob
Sent: Friday, July 27, 2018 3:36 PM
To: Griffiths, Rachel <griffiths.rachel@epa.gov>; Pensak, Mindy <Pensak.Mindy@epa.gov>; Olsen, Marian <Olsen.Marian@epa.gov>
Cc: Pocze, Doug <Pocze.Doug@epa.gov>; Metz, Chloe <Metz.Chloe@epa.gov>; Nace, Charles <Nace.Charles@epa.gov>
Subject: RE: Griffiss AFB Revised Draft Basewide PFAS (AFFF) SI Report

Hi all.

I have received the above Site Inspection Report. Note it is called "Revised Draft" rather than "Draft Final" or "Final".

The reason the document is called "Revised Draft" is that it was submitted and resubmitted by the AF to its HQ. From my looking at the Response to Comments (RTC), this mainly appears to have resulted in the deletion of some sections of text that we previously commented on. I don't think there is much new text from their HQ. As with Plattsburgh, much of the RTC refers to the "follow-on work" that will be conducted. It is my understanding that unlike Plattsburgh, the AF has no immediate plans for follow on work, as there are no apparent impacts to drinking water. A very extensive survey conducted by the AF found no private drinking water wells on base or within 4 miles of the former base boundary. I have attached the RTC for your convenience. Bob ... In a site in Minn. They discussed a PFAS plume of 6 miles. It seems the contamination went from the source, to GW to GW to GW Wondering if they have at least defined if PFAS has reached the boundary.

As for the Revised SI, I strongly suggest that you understand the AF focus for the document. That focus, and for a final if it is produced, is almost solely on presence /absence of PFAS / AFFF on base. Yes understood and impacts to drinking water.

Much of the nature and extent of contamination, human health risk, and ecological risk text and work would be done in any follow on work, potentially an RI. However, this may not happen until either EPA or NYSDEC / NYSDOH promulgate #s for PFAS.

True.

I suggest your reading the RTC first, to get a sense of what you'll see in this very large document. Hydro comments are first, followed by human health risk and then ecological risk sections. How much time you put in on the SI is up to you, but I'm not sure there is much value or efficiency in getting out your microscopes and spending time providing a large # of specific comments, when many of them would be automatically addressed in a subsequent RI. In my eventual comments to the AF I will include a general comment that in the future, EPA expects that the AF will conduct a full RI, to address all media, and that the RI Report include a detailed nature and extent section, description / discussion of all contaminant sources, a human health risk assessment, and an ecological risk assessment. Eco risk is only assessed if the fish are being consumed and then it factors into human health.

As for the RTC, it may appear a little confusing at first. The AF response columns include the initial AF contractor responses, as well as AF HQ's responses to those responses, and then the contractor's revised response.

The major glaring problem I see with the RTC is that it indicates the AF is not currently addressing recreational use of surface waters. I'm not sure if that would change in future documents. It also mentions the lack of any ecological risk #s.

The AF reportedly will be emailing a redline strikeout of the draft / revised draft text. It may be useful for reference, but will be very long. I will forward it to you when I get it.

I have put hard copies of the actual document, the only extras I have, on Marian's and Rachel's chairs.

The actual Report and other documents are on the R Drive at R:\BMORSE\docs\Griffiss AFB\Griffiss PFOS-PFOA\Basewide SI\Report\Revised Draft\AF

I am asking that you submit any comments to me by Friday August 24. Please let me know if you need to let this deadline slip.

I hope this email helps you focus your reviews and ultimately saves you time. I wish you luck and thank you in advance.

Tks...

Bob